Case 1:20-cr-00325-SHS Document 19

## Federal Defenders OF NEW YORK, INC.

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July 29, 2020

## BY ECF

The Honorable Judge Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

**MEMO ENDORSED** 

RE: <u>United States v. Desirae Schneider</u>

20 Cr. 325 (SHS)

Dear Judge Stein,

I write to request a temporary modification to Ms. Schneider's bail conditions in the above-captioned case. The Government and pretrial services take no position concerning this request.

On March 16, 2020, Ms. Schneider was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision and mental health treatment as directed; surrender of travel documents with no new applications and travel restricted to the Southern District of New York; no contact with the alleged victim outside the presence of counsel; surrender keys to the complainant's home; continued employment; no "dark web" use; no possession of firearms/destructive devices/other weapons; and GPS monitoring.

On June 22, 2020, Magistrate Judge Gorenstein granted Ms. Schneider's request for a temporary bail modification to allow her to travel to Milford, Connecticut from Saturday, June 27 through Sunday, June 28 to attend a small outdoor wedding. Ms. Schneider attended the wedding without incident. Since the start of this case, Ms. Schneider has remained in consistent compliance with the conditions of her release.

Ms. Schneider now respectfully requests a temporary bail modification to enable her to travel to Illinois to visit her family for one week in August 2020. During her visit, Ms. Schneider expects to stay with her mother, one of the co-signers of her bond.

Respectfully submitted,

/s/ Marne Lenox Assistant Federal Defender (212) 417-8721 Application granted. Defendant must inform her pretrial services officer in advance of her trip to Illinois of her address, her contact information, and the exact seven day period of her trip.

Dated: New York, New York

July 29, 2020

SO ORDERED:

HONORABLE SIDNEY H. STEIN

United States District Judge

cc: Rebecca Dell, Assistant U.S. Attorney (by ECF)
Jonathan Lettieri, Pre-Trial Services Officer (by email)